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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

10 Valentino Dimitrov, individually, and on behalf of all others similarly situated;

Case No.: CV-23-00226-PHX-DJH

Plaintiffs.

VS.

**PLAINTIFF'S APPLICATION FOR
ENTRY OF DEFAULT AGAINST
DEFENDANTS STAVATTI NIAGARA
LTD; JOHN SIMON AND JEAN SIMON**

Stavatti Aerospace, Ltd, a Minnesota corporation; Stavatti Aerospace, Ltd, a Wyoming corporation; Stavatti Corporation, LTD, a Wyoming corporation; Stavatti Industries, Ltd, a Wyoming corporation; Stavatti Niagara, Ltd., a New York corporation Stavatti Super Fulcrum, LTD, a Wyoming corporation; Stavatti Ukraine, a Ukrainian business entity; Stavatti Ukraine, a Ukrainian business entity; Stavatti Heavy Industries Ltd, a Hawaii corporation; Christopher Beskar and Maja Beskar, husband and wife; John Simon and Jean Simon, husband and wife; William McEwen and Patricia McEwen, husband wife; Rudy Chacon and Jane Doe Chacon, husband and wife; and DOES 1 through 10, inclusive.

Defendants.

Plaintiff Valentino Dimitrov (“Plaintiff”) requests the Clerk of Court enter default

1 against Defendant Stavatti Niagara, Ltd; and John Simon and Jean Simon (husband and
2 wife) (collectively, “Defendants”) pursuant to Fed. R. Civ. P. 55(a).

3 In support of this request, Plaintiff relies on the record in this case and the affidavit
4 submitted as “Exhibit A”.

5
6 RESPECTFULLY SUBMITTED this 28th day of March, 2023.
7

8 **ENARA LAW, PLLC**

9 By: /s/ George Chebat
10 George Chebat
11 Joseph J. Toboni
12 Daniel de Julio
13 *Attorneys for Plaintiff*

1 **CERTIFICATE OF SERVICE**

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3 I hereby certify that on the 28th day of March, 2023, copy of the foregoing was
4 transmitted electronically to the CM/ECF filing system for filing and transmittal along
5 with copies transmitted to all counsel of record via the CM/ECF system.

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